

ORIGINAL



0000145267

BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP
CHAIRMAN
GARY PIERCE
COMMISSIONER
BRENDA BURNS
COMMISSIONER
BOB BURNS
COMMISSIONER
SUSAN BITTER SMITH
COMMISSIONER

2013 MAY 31 P 2:58

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

MAY 31 2013

DOCKETED BY

JM

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY REQUEST FOR
APPROVAL OF UPDATED GREEN POWER
RATE SCHEDULE GPS-1, GPS-2, AND GPS-3.

Docket No. E-01345A-10-0394

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF ITS 2013 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
FOR RESET OF RENEWABLE ENERGY
ADJUSTOR.

Docket No. E-01345A-12-0290

IN THE MATTER OF THE APPLICATION OF
TUCSON ELECTRIC POWER COMPANY FOR
APPROVAL OF ITS 2013 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
PLAN AND DISTRIBUTED ENERGY
ADMINISTRATIVE PLAN AND REQUEST
FOR RESET OF ITS RENEWABLE ENERGY
ADJUSTOR.

Docket No. E-01933A-12-0296


IN THE MATTER OF THE APPLICATION OF
UNS ELECTRIC, INC. FOR APPROVAL OF
ITS 2013 RENEWABLE ENERGY STANDARD
IMPLEMENTATION PLAN AND
DISTRIBUTED ENERGY ADMINISTRATIVE
PLAN AND REQUEST FOR RESET OF ITS
RENEWABLE ENERGY ADJUSTOR.

Docket No. E-04204A-12-0297

RUCO'S NOTICE OF FILING

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby provides notice of
filing the Testimony Summary of Lon Huber, in the above-referenced matter.

1 RESPECTFULLY SUBMITTED this 31st day of May, 2013.

2
3
4 
5 Daniel W. Pozefsky
6 Chief Counsel
7
8

9 AN ORIGINAL AND THIRTEEN COPIES
10 of the foregoing filed this 31st day of May
11 2013 with:

12 Docket Control
13 Arizona Corporation Commission
14 1200 West Washington
15 Phoenix, Arizona 85007

16 COPIES of the foregoing hand delivered/
17 mailed this 31st day of May, 2013 to:

18 Teena Jibilian
19 Administrative Law Judge
20 Hearing Division
21 Arizona Corporation Commission
22 1200 West Washington
23 Phoenix, Arizona 85007

24 Janice Alward, Chief Counsel
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Steve Olea, Director
Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Thomas A. Loquvan
Pinnacle West Capital Corporation
400 N. 5th Street, MS 8695
Phoenix, AZ 85004
Attorney for Arizona Public Service Co.

Michael W. Patten
Roshka DeWulf & Patten, PLC
One Arizona Center
400 E. Van Buren Street, Suite 800
Phoenix, AZ 85004
Attorneys for Tucson Electric Power
and UNS Electric, Inc.

1 C. Webb Crockett
Patrick J. Black
2 Fennemore Craig
3003 N. Central Ave., Suite 2600
3 Phoenix, AZ 85012-2913
Attorneys for Freeport-McMoRan and AECC

4 Kevin Koch
5 2333 E. 1st Street
P.O. Box 42103
6 Tucson, AZ 85733

7 Court S. Rich
Rose Law Group, PC
8 6613 N. Scottsdale Rd., Suite 200
Scottsdale, AZ 85250
9 Attorneys for SEIA

10 Michael L. Neary, Executive Director
AriSEIA
11 111 W. Renee Dr.
Phoenix, AZ 85027

12 Timothy Hogan
13 Arizona Center for Law in the Public Interest
202 E. McDowell Rd., Suite 153
14 Phoenix, AZ 85004
Attorneys for WRA

15 Christopher D. Thomas
16 Fred E. Breedlove III
Squire Sanders
17 1 E. Washington, 27th Floor
Phoenix, AZ 85004
18 Attorneys for Sonoran Solar, LLC

19 Scott S. Wakefield
Ridenour Hienton & Lewis, PLLC
20 201 N. Central Ave., Suite 330
Phoenix, AZ 85004-1052
21 Attorneys for Wal-Mart Stores, Inc. and
Sam's West, Inc.
22
23
24

Kyle J. Smith
Regulatory Law Office (JALS-RL/IP)
Office of the Judge Advocate General
U.S. Army Legal Service Agency
9275 Gunston Road
Fort Belvoir, VA 22060-5546
Attorney for United States Department of
Defense and all other Federal Executive
Agencies

Douglas V. Fant
Law Offices of Douglas V. Fant
3655 W. Anthem Way, Suite A-109
PMB 411
Anthem, AZ 85086
Attorney for Interwest Energy Alliance

By Cheryl Fraulob
Cheryl Fraulob

Arizona Public Service Company
Tucson Electric Power Company
UNS Electric, Inc.

E-01345A-10-0394
E-01345A-12-0290
E-01933A-12-0296
E-04204A-12-0297

**SUMMARY OF THE TESTIMONY OF LON HUBER
ON BEHALF OF THE RESIDENTIAL UTILITY CONSUMER OFFICE**

The following is a summary of the direct, rebuttal and surrebuttal testimony of Residential Utility Consumer Office ("RUCO") witness Lon Huber, which presents RUCO's recommendations regarding renewable energy credit ("REC") transfer and compliance accounting mechanisms for Arizona's renewable energy standard.

RUCO's position is to allow a short window of time for the renewable energy credit ("REC") transfer issue to work itself out within the context of the broader distributed generation ("DG") cost/benefit discussion. This DG valuation matter is not some unknown future policy discussion; rather, it is imminent issue that will be addressed. APS has indicated their intent to submit a policy proposal in July and the Commission has made moves to create a separate docket/hearing for the subject. If the process does not come to a conclusion within a reasonable timeframe (one year) then RUCO recommends the adoption of a 50/50 REC split, with an exception for specific commercial customers. This would be a bridge to a more permanent solution. Although far from elegant, this solution

SUMMARY OF THE TESTIMONY OF LON HUBER (Cont.)

affords every party a key piece of what they are seeking. Moreover, Arizona's major utilities are in compliance for years in advance, particularly for commercial.

Alternatively, RUCO would be pleased to support Staff's "Track and Monitor" if it were to be amended to protect REC integrity as specified in RUCO's Surrebuttal Testimony. Multiple parties, including RUCO and the nation's leading REC certifier, Center for Resource Solutions/Green-e, concur that Staff's proposal would violate the property rights of system owners. The modification to Staff's proposal as outlined by RUCO would enable Arizona to gauge market self-sufficiently each year while also maintaining REC integrity. Furthermore, it would avoid a burdensome rule change and shield ratepayers from unwarranted expenditures.